

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LINDSEY GULDEN	:	Civil Action No. 3:24-CV-07381-MAS-TJB
	:	
and	:	
	:	
DAMIAN BURCH,	:	NOTICE OF EXXON MOBIL
	:	CORPORATION’S MOTION TO
Plaintiffs,	:	DISMISS PLAINTIFFS’ COMPLAINT
	:	OR, IN THE ALTERNATIVE, TO
v.	:	TRANSFER VENUE
	:	
EXXON MOBIL CORPORATION,	:	
	:	<u>ORAL ARGUMENT REQUESTED</u>
	:	
Defendant.	:	
	:	

TO: Neil Henrichsen
Henrichsen Law Group, PLLC
1725 1 Street, NW
Washington DC 20006

PLEASE TAKE NOTICE that, on Monday, November 18, 2024 at 9:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Exxon Mobil Corporation (“Defendant”) shall move before the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102, for an Order dismissing Plaintiffs’ Complaint pursuant to Federal Rule of Civil Procedure 12(b)(3) and 28 U.S.C. § 1406(a), or, in the alternative, transferring venue to the United States District Court for the Southern District of Texas pursuant to 28 U.S.C. § 1406(a) or § 1404(a).

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Defendant shall rely upon the accompanying memorandum of law, certification of Richard J. Cino, Esq, with exhibits, and declaration of Beth Casteel.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument pursuant to L. Civ. R. 78.1.

JACKSON LEWIS P.C.

By: /s/ Richard J. Cino
Richard J. Cino
Bianca M. Olivadoti

NORTON ROSE FULBRIGHT US LLP

/s/ Reagan M. Brown
Reagan M. Brown, Esq., *pro hac vice pending*

Dated: October 14, 2024